

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUMAN RIGHTS DEFENSE CENTER,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, et al.,

Defendants.

Case No. 2:20-cv-00674-RSL

Ninth Joint Status Report

In accordance with their Eighth Joint Status Report, filed January 10, 2022 [dkt. no. 21], Plaintiff Human Rights Defense Center (HRDC) and Defendants United States Department of Justice and its agency, the Drug Enforcement Administration (together, DEA), submit this Ninth Joint Status Report. HRDC filed this action under the Freedom of Information Act (FOIA), seeking disclosure of certain DEA documents that it sought unsuccessfully via an administrative FOIA request and appeal. Complaint [dkt. no. 1] ¶¶ 12-19.

1 As anticipated in the Eighth Joint Status Report, the DEA completed its re-
2 production of documents with reduced redactions on March 11, 2022. HRDC
3 continues to object to certain redactions within the DEA's production. The parties
4 believe that summary judgment motions practice is necessary to resolve their
5 disputes. While the parties presently anticipate filing cross-motions for summary
6 judgment, HRDC reserves the option simply to respond to the DEA's motion,
7 without filing a cross-motion. The parties propose the following schedule, which
8 allows time for the DEA to prepare a detailed *Vaughn* index that it will file with its
9 summary judgment motion.

- 10 • DEA's Motion for Summary Judgment (24-page limit) due July 8,
11 2022;
- 12 • HRDC's combined Opposition and Cross-Motion for Summary
13 Judgment (36-page limit) due August 26, 2022;
- 14 • DEA's combined Opposition and Reply (24-page limit) due September
15 30, 2022;
- 16 • HRDC's Reply (12-page limit) due October 21, 2022

17 If HRDC chooses not to file a Cross-Motion, it would not file a Reply and the
18 parties would adhere to the standard page limits prescribed by Local Civil Rule

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1 7(e)(3). The parties request that the Court enter a minute order setting their
2 proposed briefing schedule.

3 DATED this 28th day of March 2022.

4
5 s/ Caesar Kalinowski

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Respectfully submitted,
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